

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
SARAH PALIN	:	
	:	
Plaintiff,	:	
	:	
-against-	:	No. 1:17-cv-04853-JSR
	:	
THE NEW YORK TIMES COMPANY and JAMES BENNET,	:	
	:	
Defendants.	:	
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**NOTICE OF MOTION *IN LIMINE*
REGARDING CASE MANAGEMENT TECHNIQUES**

PLEASE TAKE NOTICE that Defendants The New York Times Company and James Bennet will file a motion requesting that the Court (1) direct the jurors, upon being seated, to read the editorial “America’s Lethal Politics” (the “Editorial”) and the corrections to the Editorial subsequently published by The Times; and (2) instruct the jury, prior to counsel delivering opening statements, or at the latest upon conclusion of opening statements, on the key principles of defamation law to be applied in this case and, if not previously given to them, provide to the jurors with such instruction a copy of the Editorial. Defendants have served their papers in support of this motion on March 31, 2025, and will file their papers by April 7, 2025, and Plaintiff’s answering papers are due on April 7, 2025. Pursuant to Rule 9 of the Court’s Individual Rules of Practice, *in limine* motions are normally resolved on the morning of the first day of trial.

Dated: New York, New York
March 31, 2025

Respectfully submitted,

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